

EXHIBIT 11
FILED UNDER SEAL

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Page 1

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4 Case No. 16-cv-02787-WHO

5
6 HUAWEI TECHNOLOGIES CO., LTD.,)
HUAWEI DEVICE USA, INC., and HUAWEI)
7 TECHNOLOGIES USA, INC.,)
Plaintiffs/Counterclaim)
8 Defendants,)
9 v.)
10 SAMSUNG ELECTRONICS CO., LTD., SAMSUNG)
ELECTRONICS AMERICA, INC.,)
11 Defendants/Counterclaim)
Plaintiffs,)
12 v.)
13 SAMSUNG RESEARCH AMERICA, INC.,)
Defendant,)
14 v.)
15 HISILICON TECHNOLOGIES CO., LTD.,)
Counterclaim Defendant.)
16

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18
19 *** HIGHLY CONFIDENTIAL ***

20 DEPOSITION OF CHARLES JACKSON

21 Washington, D.C.

22 June 13, 2018

23
24 Reported by: Mary Ann Payonk

25 Job No: 143456

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Page 2

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June 13, 2018

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9:00 a.m.

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Deposition of CHARLES L. JACKSON, held

8

at the law offices of Quinn Emanuel Urquhart &

9

Sullivan, LLP, 1300 I Street N.W., Suite 900,

10

Washington, D.C., pursuant to Notice before

11

Mary Ann Payonk, Shorthand Reporter and Notary

12

Public of the District of Columbia,

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Commonwealth of Virginia, and State of New

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York.

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Page 3

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15
16 ALSO PRESENT:

17 Christopher Parker, Legal Video

18 Specialist

19 R. Paul Zeineddin, Zeineddin PLLC

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Page 98

1 submitting voices to Sidley in connection with
2 this case?

3 A. No, I don't. Again, that's something
4 I definitely have records on.

5 Q. Do you know how many hours you've
6 billed to date on this case?

7 A. No, I don't.

8 Q. Do you know the approximate number of
9 hours?

10 A. I mean, this is a very rough guess,
11 don't hold it to me, but probably in the
12 neighborhood of 400 plus.

13 Q. And that's in connection with the
14 three reports we've looked at?

15 A. Yes.

16 Q. I may have asked you this earlier,
17 but I can't remember. Have you had any
18 involvement in the Chinese cases between the
19 parties?

20 A. I mean, I don't always know how --
21 what people do with reports after you do them,
22 but not to my knowledge. But, you know, I
23 don't know if this report -- one of reports has
24 been used in that litigation or something like
25 that, but I have no knowledge of such things.

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Page 110

1 contributions for several different firms; is
2 that correct?

3 A. Yes.

4 Q. And so Huawei, for example, has,
5 according to your calculations, 3,926
6 contributions to LTE?

7 A. That's correct.

8 Q. And now on page 122 of your report --
9 and I can give you a separate printout of that
10 too.

11 A. Okay.

12 Q. You set forth some of the results of
13 the analysis that you and Dr. Ding and Concur
14 IP did; is that right?

15 A. That is correct.

16 Q. And so in the far right columns, you
17 refer to deemed-issued and active patents for a
18 number of different jurisdictions; correct?

19 A. Correct.

20 Q. And so under U.S. -- excuse me. Then
21 you've broken it up by 2G, 3G, and 4G; correct?

22 A. Correct.

23 Q. And so for the U.S. we can look and
24 see that Huawei has 170 deemed essential 4G or
25 LTE patents; is that right?

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Page 111

1 A. That's correct.

2 Q. And so if you wanted to figure out
3 the ratio or the relationship between Huawei's
4 contributions and the number of actual
5 essential patents it has, you could do that
6 simply by dividing the 3,926 contributions by
7 the 170 patents, for example; right?

8 A. Well, yeah. Well, I mean, some of
9 those contributions, I'm trying to remember the
10 exact time frame of Signals research, but
11 memory tells me it runs up to the beginning of
12 2017. Some of those contributions may be
13 associated with patents that are -- have been
14 applied for but have yet to issue and -- and,
15 you know, that are in the pipeline so you -- I
16 think you need an adjustment for that, but --

17 Q. Although that's true of all the
18 companies for which you've identified
19 contributions in patents; right?

20 A. Well, you have to look at the time
21 pattern of the contributions, but yes, recent
22 contributions are more likely to be associated
23 with yet-to-be-issued patents than older
24 contributions.

25 Q. And so if I take the 3,926

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Page 124

1 every firm and that -- and that the proportion
2 applies equally to different firms for patents
3 outside their home country. You're trying --
4 you're trying to just make too much of that one
5 sentence and not -- not look at the context,
6 you know, that's -- I was trying to describe a
7 general principle that the number of
8 contributions is the sign of a -- a company's
9 R&D investment in the field, and -- and it's
10 something you can take into account when you're
11 trying to analyze a portfolio.

12 Q. Yeah, but if I understand you
13 correctly, when you say "roughly proportional,"
14 I mean, that could be almost any relationship
15 then; correct?

16 The fact that you have a certain
17 number of accepted contributions doesn't really
18 imply any specific number of U.S. essential
19 patents; right?

20 A. I mean, I didn't try to estimate the
21 constant of proportionality, I just -- I think
22 that, you know, you really should read that --
23 that ratio in the context of the preceding
24 paragraphs and look, you know, at SEPs -- I
25 mean, I'm sorry, that contributions, accepted

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Page 125

1 contributions are a sign of the firm's
2 intellectual capital and investment in
3 inventive activity and developing the design,
4 and that's become the 3GPP standard and that
5 that -- that intellectual effort will be
6 reflected in patents.

7 Q. Right, because there's definitely no
8 mathematical constant of proportionality that
9 would link an approved -- a number of approved
10 or accepted contributions to actual essential
11 U.S. SEPs; right?

12 A. I didn't try to --

13 MR. GREENBLATT: I'm sorry,
14 objection, form.

15 A. I mean, I didn't -- I didn't try to
16 estimate such quantity and there isn't such
17 quantity presented in my report, I mean, so
18 I -- I mean, you can -- you can read what I
19 wrote about -- about that association, but
20 seems to me I tried to clearly communicate why
21 I think contributions give you some insight
22 into a firm's overall position.

23 Q. When you say "overall position," you
24 mean the firm's inventive activities in a field
25 with respect to research and development, not

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Page 131

1 Q. InterDigital has 91 accepted
2 contributions for LTE; right?

3 A. That's what it says.

4 Q. And then you concluded that
5 InterDigital has 111 actual essential patents
6 in the U.S --

7 A. Yes.

8 Q. -- from LTE. So InterDigital
9 actually has more LTE essential patents than it
10 does contributions.

11 A. Yes.

12 Q. And so if you wanted to take approved
13 contributions for L -- for InterDigital, you
14 know, and divide by some number to get to the
15 number of actual essential patents, you'd never
16 get there because they actually have more
17 essential patents than contributions rather
18 than Huawei, which has 23 times as many
19 contributions as essential patents; right?

20 MR. GREENBLATT: Objection, form.

21 A. I mean, yeah, I mean, your -- your
22 description of the numbers I believe is
23 correct.

24 Q. Am I not correct that for each of
25 these companies here there's going to be a -- a

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Page 135

1 So at the outset of this case, you
2 received a call from Mike Bettinger asking you
3 to oversee the development of a patent
4 landscape study; is that right?

5 A. Well, I'd sort of summarized in
6 several phone calls and, you know, discussions.
7 And I think they had to go back and talk to
8 Huawei. And I don't know if they had multiple
9 candidates or not, but it was a decision
10 process. Didn't occur in one phone call. It
11 was probably two, three weeks, maybe more.

12 Q. Well, once you did get retained, what
13 did you do next? Like, what were the first
14 steps you took as part of your role as a
15 retained expert for Huawei in this case?

16 A. I don't recall the exact sequence,
17 but my recollection is perhaps even before I
18 was retained, I did some searches on the web
19 for landscape studies. I think I found some on
20 E websites, WIPO websites. I read some of
21 those. And relatively early in the process, I
22 received several of the landscape studies that
23 I reviewed here, and I think it was slightly
24 later that I got the early drafts of the
25 protocol that would -- Concur was going to use,

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Page 136

1 had some conversations with Dr. Ding.

2 I really should check my files to be
3 sure about this. Ultimately, I believe late
4 October, early November, I -- I went to Delhi
5 and met with the Concur team to get to know
6 them and get them to explain to me their
7 processes.

8 Q. Is that 2017?

9 A. Yes, yes.

10 Q. Before you go on, you said Delhi.
11 Talking about Delhi, India?

12 A. Yes.

13 Q. For a second, I thought you said you
14 went to a deli.

15 A. Went to a deli? Anyway, my
16 recollection is I first read these landscape
17 report -- studies and perhaps wrote something
18 up, you know, sort of a very rough first draft
19 of some of the material I first report and then
20 got more into the essentiality analysis.

21 Q. And who put together the early draft
22 of the protocol that Concur was going to
23 follow?

24 A. I'm not sure. I mean, I don't know
25 whether it's something that Concur drafted as

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Page 137

1 an example of the -- the practice that they'd
2 used in the past, or perhaps Ding, Dr. Kakaes.
3 And when I got it, I made a few edits and
4 rearranged it. And I can't remember
5 specifically if I added any steps or not. I
6 certainly reworded some of it.

7 Q. When you're talking about the
8 protocol, is that document attached as -- the
9 protocol for determining essentiality attached
10 as appendix C?

11 A. That is correct.

12 Q. If I direct your attention to
13 appendix C, this is an essentiality analyst
14 analysis protocol?

15 A. Yes.

16 Q. And so you received the initial draft
17 of this from someone, that had been put
18 together, and then you made some edits to it?

19 A. Yes, I mean, and I think I may have
20 reorganized a step or two. I just -- it's been
21 a while so I don't recall the details.

22 Q. And so am I correct that as part of
23 this protocol, patents of a particular patent
24 family were -- were to be reviewed in the
25 following order: U.S.-issued patents followed

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Page 144

1 A. Well, I mean, that's -- I mean, I
2 just read it in -- in -- in my report, but
3 basically, they downloaded the -- they
4 downloaded the ETSI declaration file, they used
5 that to identify families and used the families
6 to identify family members and then created the
7 census table. They could match those patents
8 that had been analyzed earlier with patents in
9 the -- in -- in that new census table and they
10 could identify those unmatched patents that
11 needed essentiality analysis and analyze -- you
12 know, and do the essentiality analysis for --
13 for those patents.

14 Q. And that work you just referred to,
15 the downloading of the ETSI declaration files
16 and using that information to update the
17 census, were you involved in that in any way?

18 A. On the census? I mean, I looked at
19 the -- at the results, the process was
20 described to me, but I didn't -- I -- I didn't
21 do any of the steps. And unlike the
22 essentiality review, they didn't -- I think
23 didn't have anything in that process that they
24 felt required guidance.

25 Q. And so for the -- at least for the

HIGHLY CONFIDENTIAL

Page 150

1 escalated essentiality determinations that they
2 found difficult, and Dr. Ding and I would
3 review them. We had monthly -- I mean, weekly
4 phone calls. But I don't recall any escalation
5 of the UE/nonUE cases.

6 Q. So you had one meeting in Delhi;
7 correct? Or did you go back there?

8 A. Well, two days of meetings.

9 Q. Okay. So two days of meetings on one
10 occasion in October-November, 2017. And then
11 what kind of interaction did you have with the
12 Concur IP team -- team after that?

13 A. I would pose questions to them by
14 email, get responses back. We'd get -- I'd get
15 drafts of the incomplete database. They would
16 typically, Thursday or Friday, email cases that
17 they wanted to escalate and then we'd have a
18 phone call Monday morning. Yeah, Monday
19 morning to discuss the resolution of those
20 cases. I mean, it's kind of hard because you
21 had to be able to get people in California
22 and -- and Delhi on the phone at the same time.

23 Q. Who were the people in California?

24 A. Dr. Ding was there, and counsel would
25 be on the line.

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Page 151

1 Q. And then when you said "escalate,"
2 did you and Dr. Ding divvy up the issues that
3 were escalated, or did you both look at each
4 issue?

5 A. We both would do it. And usually we
6 got the same answer. If we didn't get the same
7 answer we would reresearch the problem until we
8 had unanimity or -- or discuss it.

9 Q. And for how long did these Monday
10 calls go on? For how many weeks?

11 A. I'd -- I'd just have to look at -- at
12 my records. They went on until the process was
13 done. I can't remember quite when they
14 started, whether it was November, December. I
15 can't remember when they started, but they went
16 on to the very end.

17 Q. And when was the very end? When the
18 report was due or sometime before that?

19 A. Well, it was less before it than --
20 than we thought it was going to be, I think. I
21 want to say it was late -- up until late March
22 or something like that, maybe one in April.

23 Q. And these calls began after the
24 November 2017 meetings in Delhi?

25 A. That's my recollection, yes.

HIGHLY CONFIDENTIAL

Page 154

1 other standards, defining quantities, things
2 like that.

3 Q. So what was the total number of
4 patents that were included in the Concur IP
5 database?

6 A. Patents or publications?

7 Q. What do you mean by publications in
8 that sense?

9 A. Applications.

10 Q. Oh, I see.

11 A. Or, I mean, there are applications
12 and they were issued -- granted patents, and
13 the database has each.

14 Q. Well, how many total patents and
15 applications were there?

16 A. In the census database, I don't -- I
17 mean, I think my report mentions exact number,
18 but I want to say it's about 160,000.

19 Q. And of those, how many were escalated
20 for you and Dr. Ding to review?

21 A. Not all of -- not all -- I mean, not
22 all of those were evaluated for essentiality.
23 It was only a -- a defined subset that was
24 evaluated for essentiality. Applications that
25 didn't -- that were in families that had no

HIGHLY CONFIDENTIAL

Page 155

1 issued patents would not be evaluated.
2 Families that were dead, that is, all patents
3 and applications were expired, would not be
4 examined. So the number of them that were
5 examined was much smaller than 160,000. I want
6 to say we got two or three cases a week.
7 Maybe -- maybe one week there were as many as
8 eight.

9 Q. All right. Let me direct your
10 attention to page 101 of Jackson Exhibit 1.

11 A. All right.

12 Q. So there I see a reference to, at the
13 end of that first paragraph, a total of 256
14 companies had provided 2,180 declarations
15 listing 221,104 patents.

16 Do you see that?

17 A. Yes.

18 Q. So is that the total number of
19 patent/publications that are in the database,
20 221 --

21 A. No.

22 Q. -- 104?

23 A. No. That's the -- that's what's in
24 the ETSI database, but that includes non3GPP
25 standard. That would include things like DECT

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Page 157

1 and that analysis would continue either until
2 the family had been exhausted or the -- the
3 English, U.S., EP, and then Chinese in
4 translation had been exhausted, or a -- a -- a
5 claim was found to be essential.

6 Q. And so the essentiality analysis that
7 was done for these 12,787 patents, that would
8 have been done in the first instance by Sachin
9 Sinha and his group?

10 A. Yes.

11 Q. Then each week, they would escalate
12 two to three cases, in some cases, more than
13 that, for you and Dr. Ding to look at?

14 A. Yes.

15 Q. So approximately how many in total
16 patents did you and Dr. Ding look at through
17 this escalation process?

18 A. Well, I didn't keep a running total,
19 so I -- whatever number I gave you -- I'm
20 uncomfortable giving any number but, you know,
21 if you'll accept this imprecise, I'd say in the
22 ballpark of 100.

23 Q. And then for the patents that were
24 subject to the essentiality analysis that you
25 did that were not escalated, did you do any

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Page 158

1 kind of spot checking to see whether their
2 analysis was right?

3 A. Yes, I did, just, I mean, not very
4 systematically, but I just -- I mean, one day I
5 just sat down and I started going through,
6 picking them sort of randomly and looking at
7 the claim, looking at their comments, looking
8 at the answer they got, either why they thought
9 it wasn't essential or why they thought it was.
10 And just, as I say, it wasn't essential -- it
11 wasn't systematic, but it was enough to
12 convince me that -- that they had a pretty good
13 batting average. I don't recall coming across
14 cases that I disputed.

15 Q. And what were you looking at, the
16 Excel spreadsheet or something else?

17 A. I was looking at the Excel
18 spreadsheet. It had -- the Excel spreadsheet
19 contains their determination, their reasoning
20 for the determination, the text of the claim
21 they analyzed, a pointer to the standard
22 that -- that -- that they compared the claim
23 to.

24 Q. And approximately how many -- as part
25 of that spot-check you did that day,

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Page 160

1 finding of noninfringement because it's sort of
2 hard to prove a negative concept.

3 I think to get an understanding of
4 the sort of ab initio analysis process, the
5 escalation is a better examination of that.
6 And certainly some of those took me multiple
7 hours to determine. Dr. Ding and I make jokes
8 about how they were harassing us by their
9 choice of -- they did not escalate any easy
10 cases.

11 Q. Okay. So there were two types of
12 analysis you would do. You would do the patent
13 cases they escalated to you and Dr. Ding, and
14 then there was other -- the other instance you
15 mentioned where you sat down one day and were
16 just kind of spot checking; right?

17 A. Uh-huh.

18 Q. So when you did the spot checking,
19 did you find any determinations that had been
20 made by Sachin Sinha and his group that were --
21 you disagreed with?

22 A. I don't recall doing -- I don't
23 recall that.

24 Q. And I may have asked you this but I'm
25 now confused on the answer. When you did the

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Page 161

1 spot checking, approximately how many patents
2 did you look at?

3 A. I don't recall exactly. Probably in
4 the neighborhood of 20, but I'm not sure.

5 Q. And that was over the course of a
6 couple hours?

7 A. Afternoon.

8 Q. Okay. And in terms of the patents
9 that were escalated to you and Dr. Ding,
10 approximately how much time did you spend per
11 patent in reviewing those issues?

12 A. It was highly variable. I remember
13 one that, I -- I mean, I just immediately knew
14 looking at it that it was essential, but it
15 was -- it was an example of what I told you
16 about where the -- the -- the declared portion
17 of the standard sort of indirectly referred to
18 another standard that had a clean -- clean
19 element, and I happened to -- not too long
20 before, I was reading a book on LTE and it
21 described this process and -- and so I knew --
22 I knew why this -- you know, Concord asked
23 about this one claim element, said they
24 couldn't find it, and I -- I knew it was
25 present in the standard although it turned out

HIGHLY CONFIDENTIAL

Page 176

1 again that would have been done by the Concur
2 IP analyst without your involvement?

3 A. I mean, the initial review. Yes. I
4 mean, this was where the escalation comes in.

5 Q. Okay. Are you aware of any instances
6 in which Concur IP changed the essentiality
7 determination that had previously been made
8 under Professor Kakaes's supervision as part of
9 the work it did in -- in this case?

10 A. No, I'm not. I didn't try to
11 identify those cases.

12 Q. Would you have been able to identify
13 those cases?

14 A. I believe I have a version of
15 Dr. Kakaes' database so I probably could have
16 set up an -- an automated process to do that.

17 Q. And I may have asked you this before.
18 Did the version that you oversaw contain
19 different columns and fields than the version
20 that Professor Kakaes?

21 A. I think he did, and my answer was I'm
22 not sure. I looked only very briefly at the
23 Kakaes data sheet. I don't think I had any
24 questions that I needed to review it for to
25 answer so I -- I just looked at it to know what

HIGHLY CONFIDENTIAL

Page 177

1 was there, but I -- I didn't look at it in
2 detail.

3 Q. Do you know whether Concur IP went
4 back and reviewed any of the data that had been
5 previously vetted as part of the Kakaes
6 database?

7 A. Well, I -- I mean, there were
8 obviously applications that were to become
9 issued patents, patents that would have expired
10 and things like that so fields had to be
11 updated. I'm -- I'm not aware of whether they
12 went back and reviewed and updated the
13 essentiality determinations.

14 Q. Does the current version of the
15 Concur IP database that you oversaw reflect
16 which patents were escalated for review by you
17 and Dr. Ding?

18 A. I don't think so, no.

19 Q. Again, I may have asked you this, and
20 if I did, I'm sorry. Do you know which
21 particular litigation or arbitration the Kakaes
22 database was used in?

23 A. No, in the sense of being able to
24 tell you or know in the sense of knowing where
25 in my files I could find it. Off the top of my

HIGHLY CONFIDENTIAL

Page 178

1 head, I -- I believe it's something called TCL,
2 but --

3 Q. TCL versus Ericsson?

4 A. I don't know. I'm just not confident
5 to -- to give you that answer without checking
6 the files.

7 Q. Now, am I correct that the people at
8 Concur IP had previously done these
9 essentiality studies when they were part of
10 Thompson Reuters?

11 A. Similar studies, yeah. I mean, they
12 got substantial experience in this.

13 Q. Was the Kakaes database that you have
14 in your possession done by the analysts when
15 they were at Concur IP or Thompson Reuters or
16 both or --

17 A. I don't know.

18 Q. And then step 3 on page 111 talks
19 about documenting the process and the
20 conclusions; is that right?

21 A. Yes.

22 Q. And it says that for each patent
23 analyzed, the analyst records in the database a
24 representative UE claim, a representative nonUE
25 claim, a characterization of the claims as

HIGHLY CONFIDENTIAL

Page 184

1 there, but then they narrow the -- the larger
2 database down to what they ultimately report to
3 us.

4 Q. Let me ask you this. Of the 158 or
5 so -- 158,000 or so entries in the current
6 version of the database, how many of those
7 entries came unchanged from the Kakaes
8 database?

9 A. I -- I just -- I'd have to -- I mean,
10 I -- I'd have to go back and do an audit. I
11 mean, the -- the -- my understanding of the
12 process, it's a little bit different than that.

13 The Kakaes, you know, database really
14 is post essentiality analysis. And my
15 understanding was that they basically got the
16 ETSI declaration, generated a census from that,
17 and -- and then matched the output of the
18 census with the prior data to fill in those
19 fields. But I can't give you the details of
20 that process.

21 I mean, obviously there have been a
22 bunch of changes to the patents that were in
23 the earlier database. I mean, some expired,
24 others went from applications to patents.

25 Q. But for those that didn't expire or

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Page 185

1 change from an application to a patent, how
2 many then -- for how many of those patents did
3 the information in the Kakaes database just get
4 shifted over to your database?

5 A. I -- I believe that for the ones that
6 were, you know, existing and weren't -- really
7 unchanged since the Kakaes database that the
8 essentiality determination was copied over and
9 reused.

10 Q. And so before, you directed me to
11 table 10, which showed that there were a total
12 of 12,787 patents that were subject to
13 essentiality analysis.

14 A. Yes.

15 Q. Of those 12,787, how many were simply
16 copied over from the Kakaes database?

17 A. I don't know. I -- we could probably
18 go out and determine it, but I have not done
19 so.

20 Q. Would you say 80 percent or higher?
21 Lower?

22 A. I'd have to -- I haven't done that
23 analysis so I can't give you a number.

24 Q. Just to be clear, if the Kakaes
25 database reflected an essentiality

HIGHLY CONFIDENTIAL

Page 186

1 determination for a particular patent and that
2 patent was still relevant to your analysis, in
3 other words, not expired or, you know, to be
4 removed for some reason, that essentiality
5 analysis was simply copied over?

6 A. I believe that to be the case, yes.

7 Q. Okay. Now, from the Concur IP
8 database, am I correct you can filter that data
9 in many different ways?

10 A. Yes.

11 Q. And by filter, I mean using like
12 Excel spreadsheet functions.

13 A. Right, right. That's what I --
14 that's what I took you to mean, yes.

15 Q. And so you can filter, for example,
16 to see how many essential patents a particular
17 company has in the U.S. versus some other
18 geographic region?

19 A. Yes. There's a -- a field in the --
20 in the database for the jurisdiction issuing
21 the patent so you could ask for patents -- you
22 can identify patents or family by jurisdiction
23 or multiple jurisdictions.

24 Q. And I take it you can also filter by
25 patents that are directed to UE or handsets